

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K., and K.P.,
Plaintiffs,

vs.

RED ROOF INNS, INC., et al.,

Defendants.

Civil Action No.

1:20-cv-05263-VMC

VOLUME II

VIDEOTAPED DEPOSITION OF C.A.

August 12, 2022 - 10:10 a.m.

1201 West Peachtree Street, NW

Suite 3900

Atlanta, Georgia

J. David Brown, B-1401

PL Sum. J.
Ex. 021

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7 Red Roof Franchising, LLC; RRI West Management, LLC;

8 Westmont Hospitality Group, Inc.; and RRI III, LLC:

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17 Also Present:

18 LEO MILEMAN, Videographer

19

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1 do you mean when you say that my team is not the
2 same as every other team?

3 A I'm not really sure what I mean in this
4 paragraph. But I think I would have been referring
5 to like comparing Bagz and Fresh possibly. Because
6 when I was with Fresh, it was more like a
7 girlfriend/boyfriend kind of a thing, at least I
8 thought that. Whereas with Bagz it was a little
9 bit more strict I guess.

10 Q So you considered Fresh your boyfriend?

11 A No, not necessarily my boyfriend. But I
12 thought of him that way I guess maybe.

13 Q Did you want him to be your boyfriend?

14 A Yeah.

15 Q I mean at this time he was living with
16 you, right?

17 And around this time you wanted him to be
18 your boyfriend or you kind of thought of him in
19 that way. Was he -- were you also allegedly being
20 sex trafficked?

21 A Yes.

22 Q During the time that you thought that he
23 was your boyfriend?

24 A Yes. So when this happened, this
25 situation, I had just been in the hospital -- I had

1 been in the hospital because I had seen a text
2 message from Shayna to Fresh on the phone and he
3 broke my nose. So -- and even going like through
4 the phone, I was doing that because I was wanting
5 him, you know, to be -- the relationship with him
6 was more that's why I say boyfriend/girlfriend.
7 Whereas that was something that I would have never
8 done with Bagz, you know, because --

9 Q I'm sorry -- you can finish your answer.

10 A No, that's it.

11 Q Well, what would you have never done with
12 Bagz?

13 A Go through the phone.

14 Q Oh, okay. You were going through Fresh's
15 phone?

16 A Right.

17 Q And you saw a text from [REDACTED]?

18 A Right.

19 Q And you got upset?

20 A Yeah. I felt like I was being worked
21 more and I felt like it was -- I mean at the time.
22 And now looking back, obviously it is different.
23 But at the time I felt like I was being or that she
24 was being like favored or something like that.

25 Q And so at this time did you think, you

1 and commented on your atl bunny account --

2 A Yeah.

3 Q -- to tag him, right?

4 A It looks like it.

5 Q So did you connect this sentiment with
6 Bagz, the sentiment that intimacy is not purely
7 physical?

8 A Sure. Yes, I did.

9 Q And that so did you consider that your
10 relationship with Bagz was not purely physical but
11 that you had a deep connection with him that you
12 could like as it says in the post?

13 A I mean I thought I was in love with him,
14 so in a sense yes. I mean yeah.

15 Q So at the time you thought you or you
16 felt like you could see into each other's souls?

17 A I mean I wouldn't take it -- I wouldn't
18 take the post -- no, I wouldn't say I would take
19 that post literally like that.

20 Q But did you post this just as a loving
21 symbol to Bagz?

22 MS. MYKKELTVEDT: Object to the form.

23 A No, I wouldn't say as a loving symbol.

24 As a deeper symbol I guess. I guess I wanted to --

25 I felt like -- what's the word I'm looking for -- I

1 Q All right. So were you scared when you
2 reached out to them then?

3 A I mean there's a little bit of like, you
4 know, fear in that. But at the same time I, you
5 know, I'm being honest and I had reached out, you
6 know, for money. I feel like, you know, I felt
7 like that they -- I guess I felt like that they not
8 like owe me but like, you know --

9 Q Were --

10 A -- because of the children.

11 Q Sorry.

12 A No, that's it.

13 Q Were Bagz or Fresh ever physically
14 violent with other people besides the girls or
15 women that worked for them?

16 MS. MYKKELTVEDT: Object to the form.

17 A Yeah. I mean I know about like an
18 incident or two that Bagz was physical with other
19 people, yeah, that weren't just his girls.

20 BY MS. HENRY:

21 Q Do you think I would be in physical
22 danger if I was in a room with Bagz or Fresh?

23 MS. MYKKELTVEDT: Object to the form.

24 A I mean under what circumstances?

25

1 BY MS. HENRY:

2 Q In a setting like this.

3 A I mean yeah. I mean you could be, yeah.

4 Q Why do you think that?

5 A You're a female and I mean especially if
6 they have a reason to be upset with you or
7 something.

8 (Exhibit 41 marked)

9 BY MS. HENRY:

10 Q I'm going to hand you Exhibit 41. And
11 this is another document that you produced to us.
12 Do you recognize this?

13 A It is an email that I wrote to my family.
14 I mean I'm going to read it to jog my memory
15 but ...

16 Q Yeah, you can take a second.

17 A Oh, it is that email that I was
18 explaining to my family that I was having a baby.

19 Q And so are you finished reading it?

20 A No. But that's okay. You can go on.

21 Q No. I'll let you finish reading the
22 whole thing. You can just tell me when you're
23 done.

24 A Okay.

25 Q And so you wrote this on December 7th,

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CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down to the best of my ability, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 20th day of August, 2022.



J. DAVID BROWN, CCR-B-1401